

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Tracking of
 (Identify the person to be tracked or describe
 the object or property to be used for tracking)
 THE GRAY DODGE CHARGER BEARING OHIO
 LICENSE PLATE JJC1614 AND VIN
 2C3CDXJG4FH754887

Case No. **1:22-MJ-00395**

APPLICATION FOR A TRACKING WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or attorney for the government, have reason to believe that the person, property, or object described above has been and likely will continue to be involved in one or more violations of

18 U.S.C. § 1349 et al. (see aff.) . Therefore, in furtherance of a criminal investigation, I request authority to install and use a tracking device or use the tracking capabilities of the property or object described above to determine location. The application is based on the facts set forth on the attached sheet.

- | | |
|---|--|
| <input checked="" type="checkbox"/> The person, property, or object is located in this district. | <input type="checkbox"/> The activity in this district relates to domestic or international terrorism. |
| <input type="checkbox"/> The person, property, or object is not now located in this district, but will be at the time of execution. | <input checked="" type="checkbox"/> Other: The vehicle will be in this District when the tracking device is installed. |

The tracking will likely reveal these bases for the warrant under Fed. R. Crim. P. 41(c): (check one or more)

- | | |
|---|--|
| <input checked="" type="checkbox"/> evidence of a crime; | <input checked="" type="checkbox"/> contraband, fruits of crime, or other items illegally possessed; |
| <input checked="" type="checkbox"/> property designed for use, intended for use, or used in committing a crime; | <input type="checkbox"/> a person to be arrested or a person who is unlawfully restrained. |

- ☒ I further request, for purposes of installing, maintaining or removing the tracking device, authority to enter the following vehicle or private property, or both:
 (1) The gray Dodge Charger bearing Ohio license plate JJC1614 and VIN 2C3CDXJG4FH754887; and (2) the parking garage connected to 424 Straight Street, Cincinnati, OH 45219

- ☒ Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Derek Graham

Applicant's signature

Derek Graham, ATF Special Agent

Applicant's printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 FaceTime videoconference (specify reliable electronic means).

Date: Jul 14, 2022

Stephanie K. Bowman

Judge's signature

City and state: Cincinnati, Ohio

Hon. Stephanie K. Bowman, U.S. Magistrate Judge
 Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

IN THE MATTER OF THE TRACKING OF
THE GRAY DODGE CHARGER BEARING
OHIO LICENSE PLATE JJC1614 AND VIN
2C3CDXJG4FH754887

Case No. 1:22-MJ-00395

Filed Under Seal

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Derek Graham, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant under Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 3117 to authorize the installation and monitoring of a tracking device on a gray Dodge Charter bearing Ohio license plate number JJC1614 and VIN 2C3CDXJG4FH754887 (“the **SUBJECT VEHICLE**”). Based on the facts set forth in this affidavit, I believe that the **SUBJECT VEHICLE** is presently being used in furtherance of violations of 18 U.S.C. §§ 922(a)(6) (False Statement During Purchase of a Firearm), 1341 (Mail Fraud), 1343 (Wire Fraud), 1349 (Conspiracy to Commit Mail and Wire Fraud), 1028A (Aggravated Identity Theft), and 371 (Conspiracy to Commit an Offense Against the United States) (collectively, the “Target Offenses”) and that there is probable cause to believe that the installation of a tracking device on the **SUBJECT VEHICLE** and use of the tracking device will lead to evidence, fruits, and instrumentalities of the aforementioned crimes as well as to the identification of individuals who are engaged in the commission of those crimes.

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), and have been so employed since October of 2007. As a part of my training with the ATF, I graduated from the Federal Law Enforcement Training Center, Criminal Investigator School, located in Brunswick, Georgia. I graduated from the ATF Special Agent Basic Training Academy, located

in Brunswick, Georgia, in April 2008. Prior to my employment with ATF, I was a Federal Air Marshal in the Department of Homeland Security from June 2006 through October 2007. In addition, I was a Criminal Research Specialist with the Washington, DC High Intensity Drug Trafficking Area/Drug Enforcement Administration from June 2003 through June 2006. I am a graduate of Augustana College, where I received a Bachelor's degree in Business Administration in May of 2002. I am also a graduate of Boston University, where I received a master's degree in Criminal Justice in June of 2006.

3. I have experience in the investigation, apprehension, and prosecution of individuals suspected of being involved in federal firearms and drug offenses. I have specific experience in investigating the use of cell phones by criminal suspects who are involved in the commission of those offenses. I have been trained by ATF as a Digital Media Collection Specialist (DMCS) and have completed more than 285 forensic extractions of cellular telephones, computers, and other electronic storage media.

4. I also have experience in the use of tracking devices on vehicles. Based on my training and experience, I know that installing a tracking device on a vehicle can assist law enforcement in surveilling and identifying suspects as they prepare to and commit crimes, and it can also assist law enforcement in finding locations used by suspects, such as residences and stash houses where contraband is being stored.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

A. Introduction

6. From on or about April 8, 2022, through on or about June 22, 2022, one or more unidentified persons made more than 376 attempts to purchase firearms online and/or to have them transferred by mail to various Federal Firearms Licensees (FFLs) in the Southern District of Ohio, where the transactions could be completed and the firearms could be picked up. Many of these orders were placed in the name of one of the following individuals: ANEESAH WILLIAMS, JAIDAH JONES, MYKIA MELTON, KAZYRA ROBERTSON, LATRICE WALKER, NEHEMIAH JONES, ZEPHANIAH JONES, CHAD BAUER, and TYLER SNEED, among others. Many, and possibly all, of the purchases and attempted purchases were made using stolen credit card information.

7. Further investigation has shown that some of the suspects named above have arrived at FFLs in this District and have completed, or attempted to complete, the sales.¹ During some of those in-person interactions, the suspects have represented that they were the true purchasers of the firearms but have made statements or taken other actions suggesting that, in fact, they were buying the firearms for someone else. Some of the suspects have also provided false information about their residences on ATF Form 4473 – Firearms Transaction Record (“ATF Form 4473”).

¹ Based on my training and experience, I know that a sale of a firearm through an FFL is required to take place in the same State as which the individual is a resident. If an individual purchases a firearm from an FFL from another State, the FFL will transfer the firearm to an FFL within the individual’s State of residence. The FFL in the receiving State may then complete the transfer, and finalize the sale, by having the purchasing individual complete an ATF Form 4473. An FFL participating in the final stage of the transfer to the purchasing individual generally charges a nominal fee for the service.

8. I am now seeking a warrant authorizing the use of a tracking device to track a vehicle used by two of the suspects, NEHEMIAH JONES and ZEPHANIAH JONES. As described in more detail below, there is probable cause to believe that the requested warrant will assist law enforcement in surveilling the suspects as they commit violations of the Target Offenses, that the location data itself will constitute relevant corroborating evidence, and that the location data will also assist law enforcement in finding locations at which relevant evidence will be found, such as residences and stash houses.

B. On May 10, 2022, ANEESAH WILLIAMS purchased a firearm from FFL North College Hill Gun Store, listing as her residence an address on Knox Street in Cincinnati.

9. On May 10, 2022, at North College Hill Gun Store, located at 1849 W. Galbraith Road, Cincinnati, OH, ANEESAH WILLIAMS completed the purchase of a Glock-manufactured, Model 43x pistol. According to North College Hill Gun Store employee B.P., this firearm was already in stock; it was not one that had been ordered from out of state.

10. On the ATF Form 4473 WILLIAMS submitted in relation to the purchase, she listed her address as 1924 Knox Street, Cincinnati, OH.

C. Days later, six more firearms were purchased online from an FFL in Knoxville, TN, in WILLIAMS's name, but listing a billing address in Florida.

11. Five days later, on May 15, 2022, two online orders for a total of six firearms were placed in WILLIAMS's name with FFL Smoky Mountain Guns & Ammo in Knoxville, TN ("Smoky Mountain Guns"), for transfer to North College Hill Gun Store in Cincinnati. The first order was for three Glock pistols; the second was for one Glock pistol and two FN pistols. One order was placed with a Master Card ending in 606457; the other was placed with a MasterCard ending in 635590.

12. For both orders, WILLIAMS's address was listed not as 1924 Knox Street—the address she had used on May 10, 2022, when buying an in-stock firearm—but as 4701 88th Ave North, Pinellas Park, FL 33782. The listed telephone number was 614-828-7794, and the email address was ESSENCED2016@GMAIL.COM. Records from Google, produced in June 2022, show that ESSENCED2016@GMAIL.COM has as its recovery SMS phone number 267-969-1136—a phone number that, as I describe below, was also used for other online orders of firearms placed in the name of NEHEMIAH JONES²; as I describe below, the evidence suggests that these orders were fraudulent and placed as part of the same conspiracy, because they were also paid for using stolen credit card information and false addresses.

13. On May 20, 2022, WILLIAMS arrived at North College Hill Gun Store to complete the transfer. According to employee B.P., WILLIAMS was accompanied by an unknown Black male who was only slightly taller than WILLIAMS is. According to B.P., the unknown Black male asked about some firearms, prompting B.P. to ask the male's age. Upon learning that the male was under twenty-one years of age, B.P. said he would not speak with the male about firearms.³ I believe the Black male who accompanied WILLIAMS may have been her boyfriend STEVEN McCLOUD, because, as described in more detail below, there is evidence that she gave a firearm to him within days of this incident; because, according to driver's license information, WILLIAMS is 4'9" and McCLOUD is 5'2"; and because McCLOUD is under 21 years old.

² This telephone number was also provided by ZEPHANIAH JONES, a suspected coconspirator and relative of NEHEMIAH JONES, as discussed in more detail below, on two separate ATF Form 4473s from April 1 and 12, 2022, respectively.

³ An FFL is prohibited from transferring handguns to a person under the age of 21. There is no Federal prohibition on speaking with an individual under the age of twenty-one about a handgun, but an FFL may choose to enact this policy at their own discretion.

14. On the ATF Form 4473 for the transfer of the six firearms, WILLIAMS once again listed her address as 1924 Knox Street, Cincinnati, OH—not the Florida address used for the online purchases in her name.

15. In Box 10 of the ATF Form 4473, which asks for the purchaser's "Current State of Residence and Address," WILLIAMS started to write and then scratched out "370" and another digit that cannot be fully read, as shown below.

Section B - Must Be Completed Personally By Transferee/Buyer							
9. Transferee's/Buyer's Full Name (If legal name contains an initial only, record the initial followed by "IO" in quotes. If no middle initial or name, record "NMN".)							
Last Name (including suffix, e.g., Jr, Sr, II, III)		First Name		Middle Name			
Williams		Aneesah		Monet			
10. Current State of Residence and Address (U.S. postal abbreviations are acceptable. Cannot be a post office box.)							
Number and Street Address		City		State	ZIP Code	County/Parish/Borough	
370 1924 Knox St		Cincinnati		OH	45204	Hamilton	
11. Place of Birth		12. Height	13. Weight	14. Sex	15. Birth Date		
U.S. City and State		Ft.	(lbs.)	<input type="checkbox"/> Male	Month	Day	Year
Cincinnati Ohio		In. 4	115	<input checked="" type="checkbox"/> Female	11	28	1995
-OR- Foreign Country							

16. I believe that WILLIAMS likely started writing either "3703 Glenway Avenue" or "3707 Glenway Avenue," because WILLIAMS filed a burglary report with the Cincinnati Police Department on May 29, 2022, and provided information that the burglary occurred on May 28, 2022, at 3703 Glenway Avenue, Cincinnati, OH. Additionally, on June 9 and June 13, 2022, law enforcement saw ANEESA WILLIAMS entering and/or exiting 3707 Glenway Avenue, and records from Duke Energy show that WILLIAMS is the listed subscriber for utilities at that address.

D. On May 25, 2022—five days after buying six firearms at North College Hill Gun Store—WILLIAMS completed a transfer at FFL American Trading Company of another firearm she had bought from Guns.com.

17. On May 25, 2022, FFL American Trading, at 3236 W. Galbraith Road, Cincinnati, OH ("American Trading") received a firearm that WILLIAMS had ordered online from Guns.com, namely, a Romarm/Cugir/Century Arms-manufactured Micro Draco.

18. Later the same day that the firearm arrived at American Trading, WILLIAMS arrived at the store to complete the transfer. On the ATF Form 4473, WILLIAMS again listed her address as 1924 Knox Street, Cincinnati, OH.

19. According to American Trading employee N.C., WILLIAMS was on a cell phone, speaking to a third party, during the entire transaction.

20. After WILLIAMS completed the purchase, N.C. saw her enter the passenger side of a Chevy Malibu. N.C. noticed that there were plenty of parking spots in front of the building but that the Malibu was parked around the side of the building, on Georgiana Drive.

E. On May 29, 2022, shortly after a shooting involving her boyfriend and one of the Glocks she had purchased, WILLIAMS filed a police report claiming that two of her Glocks had been stolen.

21. On May 28, 2022, at about 8:09 p.m., police responded to the scene of a shooting to find a male assailant standing over STEVEN McCLOUD, who had been shot, and punching McCLOUD in the face. The assailant, who was arrested, had a Glock pistol in his hand. A review of the Glock's serial number revealed that it was the Glock that WILLIAMS had purchased from North College Hill Gun Store on May 10, 2022.

22. CPD Det. Blackwell later received statements from both McCLOUD and WILLIAMS confirming that McCLOUD is WILLIAMS's boyfriend.

23. The next day, May 29, 2022, WILLIAMS filed a police report in which she claimed that on May 28, 2022, at about 6:30 p.m., she had left her apartment for half an hour and returned to find that her door was open and that two of her Glock pistols were missing.

24. Based on my training and experience, the evidence that McCLOUD is WILLIAMS's boyfriend, the fact that WILLIAMS did not report the Glocks as stolen until 12:30 p.m. on May 29, 2022 (the day after the alleged break-in), and the other evidence in this affidavit tending to show that

WILLIAMS has been making straw purchases for a third party, I believe the most likely scenario is that WILLIAMS purchased the Glock pistols for McCLOUD, that McCLOUD brought one of the pistols to the interaction that led to him getting shot, and that the assailant somehow gained control over the weapon during a struggle. I further believe, based on my training and experience and the evidence in this investigation, that WILLIAMS likely filed a false police report to try to explain why a pistol she had recently bought was used in a felonious assault shortly thereafter.

F. On June 1, 2022, after American Trading denied another attempted purchase by WILLIAMS, an unknown male, via phone, threatened violence against the FFL.

25. On June 1, 2022, WILLIAMS returned to American Trading. Employee N.C. said that, upon entering, WILLIAMS asked if N.C. remembered her and said she was there to pick up “that Glock.”

26. N.C. said he/she told WILLIAMS that a firearm had not arrived for her. According to N.C., WILLIAMS became upset and called someone that she identified to N.C. as “[her] man.”

27. N.C. asked WILLIAMS where she had purchased the firearm she intended to pick up, and WILLIAMS responded that she had purchased it from FedEx. FedEx is not an FFL, so I believe this statement is evidence that WILLIAMS did not place the order herself.

28. N.C. said he/she told WILLIAMS that she could not purchase a firearm for another person and that American Trading did not want her business if she was doing so. WILLIAMS then left without completing the transfer of a firearm.

29. N.C. said that, approximately five minutes later, an unknown male called American Trading from phone number 330-921-0471, referenced WILLIAMS’s name, and asked about the firearm WILLIAMS had attempted to obtain. According to N.C., the unknown male called the firearm “my gun” and asked N.C. why he could not have it. According to N.C., the unknown male also said he knew where N.C. was and that he was going to shoot N.C.

30. Another employee, D.P., said the unknown male called again a short time later and asked what time they (the employees) got out of work and asserted that he was going to shoot D.P. and the front of the store.

31. According to D.P., he/she received a telephone call on June 2, 2022, from the transferring FFL regarding the firearm that WILLIAMS had attempted to pick up the day before. D.P. said he/she told the FFL not to transfer the firearm and that he/she would not be completing the transfer to WILLIAMS.

32. Records from Guns.com show that the same phone number that was used to place the threatening call to American Trading is linked to eleven suspected fraudulent transactions with customer email address CLEARY091150@GMAIL.COM. The Guns.com records show that this email address is linked to ANEESAH WILLIAMS's name, and I discuss additional evidence relating to CLEARY091150@GMAIL.COM below.

G. Also on June 1, 2022, WILLIAMS completed a transfer of another firearm from North College Hill Gun Store.

33. On the same day as the denied transaction described in the preceding section—June 1, 2022—WILLIAMS completed a transfer of a Sig-manufactured, Model PMCX pistol from North College Hill Gun Store. The firearm had been ordered in her name from Smoky Mountain Guns. On the ATF Form 4473, WILLIAMS listed her address as 1924 Knox Street in Cincinnati.

34. According to employee B.P., WILLIAMS said another firearm was being shipped to North College Hill Gun Store and that she would return once it arrived. However, B.P. explained that Smoky Mountain Guns contacted him/her on June 3, 2022, and requested that the firearms not be transferred to WILLIAMS due to being a suspected fraudulent purchase.

35. According to B.P., North College Hill Gun Store did not contact WILLIAMS regarding the arrival of the firearms transferred on May 20, 2022, or on June 1, 2022. B.P. also explained that North College Hill Gun Store employees do not open shipped FedEx or UPS boxes containing firearms until the purchasing customer arrives and provides a tracking number for the shipment. Based on this information and confirmation from Guns.com that shipping notifications are sent by email, I believe that WILLIAMS and/or her coconspirator(s) are receiving delivery notices via email.

H. On May 25 and 26, 2022, several firearms were purchased online in MELTON's name, but with apparently fraudulent credit card information, for delivery to Target World.

36. On May 25 and 26, 2022, several firearms were purchased online in MYKIA MELTON's name for delivery to Target World in Cincinnati. The details of these purchases are as follows:

Date	Type of Firearm	FFL	Billing Address
5/25/22	FN pistol	Guns.com in Minnesota	1160 West Exchange Street, Akron, OH
5/25/22	FN pistol	Smoky Mountain Guns in Knoxville, TN	1910 SW 275 Rd, Kingsville, MO
5/25/22	Century Arms Model Micro Draco AK-style pistol	The Gun Crew LLC in Old Hickory, TN	815 Gatehouse Lane, Columbus, OH
5/26/22	Glock pistol	HD Arms LLC in Henderson, NE	8678 Mile Road, New Lebanon, OH
5/26/22	Glock pistol	J&K Associates in Havre de Grace, MD	8678 Mile Road, New Lebanon, OH
5/26/22	Glock pistol	Black Wing Shooting Center in Delaware, OH	8678 Mile Road, New Lebanon, OH

I. On May 27, 2022, MELTON attempted to complete a firearms transaction of two firearms at Target World and gave MYKIAANDERSON10@GMAIL.COM as her email address.

37. On May 27, 2022, MELTON arrived at Target World and attempted to complete the transfer of two of the firearms. On an ATF Form 4473, MELTON listed her address not as any of the four addresses listed on the above orders but as 2561 Sunnyhill Drive, Cincinnati, OH.

38. According to Store Manager T.W., MELTON did not want to shoot the firearms at the range and said she would shoot them in her backyard instead. T.W. said that, because MELTON did not show any interest in examining or trying out the firearms, and based on his/her years of experience working at an FFL, he/she believed the transaction to be a “straw purchase.”⁴ T.W. therefore advised MELTON that her firearms transaction was in a delayed status.

39. T.W. then requested that MELTON confirm her telephone number and email so he/she could contact MELTON when the firearms could be transferred. MELTON provided telephone number 513-344-3444 and email address MYKIAANDERSON10@GMAIL.COM—both different from the phone number and email address provided when the orders were placed.

40. T.W. said that, on June 2, 2022, he/she spoke with a person who was using 513-344-3444 and who identified herself as MELTON. T.W. said he/she explained to MELTON that her firearms transaction was delayed and that she would be notified when it could proceed. T.W. said MELTON then asked her to repeat what he/she had said, at which time T.W. could tell MELTON had activated the speakerphone function on her phone (suggesting to T.W. that a third party was

⁴ A “straw purchase” is a term used to describe the illegal purchase of a firearm on behalf of another person. A common example of a straw purchase is when an individual falsely represents to the FFL that he or she is the actual buyer of the firearm, when in fact he or she is buying the firearm for someone else.

listening in). T.W. then repeated what he/she previously told MELTON about the delayed firearms transaction.

41. On June 3, 2022, Target World Store Manager T.W. received an email from Guns.com regarding the five firearms purchased in MELTON's name that had been shipped to Target World, either directly from Guns.com or as Guns.com providing a listing service for other FFLs. The email detailed a chargeback being initiated by the cardholder's credit card company and asserted that the orders were being flagged as possibly fraudulent.

J. On May 31, 2022, MELTON attempted to complete the purchase of two firearms linked to the email address RAYNELL PARKS@GMAIL.COM.

42. On May 26, 2022, two online orders for Glock pistols were placed in MELTON's name, one with FFL HD Arms, LLC, and the other with FFL One Stop Pawn in Mission, TX. These firearms were transferred to American Trading in Cincinnati. The listed billing address for both orders was 8678 Mile Road, New Lebanon, OH 45345; the telephone number was 513-986-8977; and the email address was RAYNELL PARKS@GMAIL.COM. (Below I discuss other apparently fraudulent transactions connected to this email address.)

43. On May 31, 2022, MELTON arrived at American Trading and attempted to complete the transaction of the two Glock pistols. On the ATF Form 4473, MELTON again listed her address as 2561 Sunnyhill Drive, Cincinnati, OH.

44. MELTON's purchase of the firearms was delayed. On June 6, 2022, MELTON contacted American Trading regarding the status of her pending firearms transaction, and American Trading employee "D.P." told her the firearms transaction had been determined to be fraudulent and that the firearms would not be provided to her.

K. From May 25 to 27, 2022, someone made approximately 32 attempts to buy firearms in KAZYRA ROBERTSON's name using the email addresses HARDYYOU2009@GMAIL.COM and KENNETHHELLD98@GMAIL.COM.

45. Records from Guns.com show that, from May 25 through 27, 2022, one or more individuals made approximately 32 attempts to purchase firearms from Guns.com in the name of KAZYRA ROBERTSON. These attempted purchases used seven different billing addresses, were all placed from IP address 174.101.153.109,⁵ and were all for delivery to the two separate American Trading locations in the Cincinnati area. Thirteen of the attempted orders listed HARDYYOU2009@GMAIL.COM as the customer address, and the rest listed KENNETHHELLD98@GMAIL.COM.

46. On June 3, 2022, ROBERTSON went to American Trading to complete a transfer of a firearm. An American Trading employee said in an interview that ROBERTSON was using a cellular telephone during the entire attempted firearms transfer.

47. American Trading did not transfer the firearm to ROBERTSON on June 3, 2022, and employee N.C. asked ROBERTSON for a phone number at which she could be reached when the firearms were approved for transfer. ROBERTSON gave phone number 513-580-3692.

⁵ This same IP address was also used to place an online order in the name of JAIDAH JONES on May 20, 2022. There is probable cause to believe that JONES is also involved in the conspiracy. For example, on May 25, 2022, FFL American Trading received as a transfer from Guns.com a pistol that had been ordered in the name of JAIDAH JONES. JONES completed the transfer at American Trading on May 27, 2022, and provided a home address on Ravenna Street in Cincinnati. On the same day, however, an order for two Glock pistols was placed with Guns.com in the name of "JADIAH JONES" (an apparent misspelling of JAIDAH JONES); the listed address on that order was not on Ravenna Street in Cincinnati but on West Pine Lake Road in Salem, Ohio. The two firearms were shipped to FFL American Trading II, located at 3621 Harrison Avenue, Cincinnati, OH ("American Trading II"), and received on June 3, 2022. In an interview, American Trading II employee B.R. said that, on the day the firearms arrived, he/she contacted Guns.com and determined that the firearms would not be transferred to JONES due to being a suspected fraudulent purchase. Later that same day, on June 3, 2022, JONES arrived at American Trading II and attempted to complete the transfer of the firearms, but American Trading II did not transfer the firearms to JONES.

L. The phone number linked to the orders under ROBERTSON's name was also used for many other suspected fraudulent transactions under the name TYLER SNEED and the email address DMONIICLARK07@GMAIL.COM.

48. Records from Guns.com show that the orders under ROBERTSON's name were linked not to the phone number she provided but to phone number 513-341-5834. When I reviewed Guns.com's records for orders associated with that number, it revealed 72 attempted orders, all of which were under either ROBERTSON's name or the name "TYLER SNEED." 23 different billing addresses were listed, and all of these orders listed a customer email address of DMONIICLARK07@GMAIL.COM.

M. Many other suspected fraudulent transactions were placed under TYLER SNEED's name.

49. I also reviewed Guns.com's records for any other transactions linked to customer name "TYLER SNEED." This revealed that the name is associated with 10 attempted orders using email addresses RICHARDRIVERA20088@GMAIL.COM and MICHAELM20079@GMAIL.COM. Four different billing addresses are linked to the orders for RICHARDRIVERA20088@GMAIL.COM and two different billing addresses are linked to the orders for MICHAELM20079@GMAIL.COM. All 10 of these orders were placed between May 27 and May 31, 2022, for delivery to both American Trading locations, and are linked to the same phone number: 513-596-8358.

N. The phone number linked to the ten attempted orders placed under SNEED's name was also used to place suspected fraudulent transactions linked to email addresses KEYERAD2007@GMAIL.COM and OPALB91773@GMAIL.COM.

50. Records from Guns.com show that telephone number 513-596-8358 is linked to a total of 28 attempted orders placed between May 20 and May 31, 2022, each of which was placed under the name TYLER SNEED, JAIDAH JONES, "Jadiah Jones" (an apparent misspelling of JAIDAH JONES), or Charmell Allen.

51. The two attempted orders placed in Charmell Allen's name were placed on May 24, 2022. Two different billing addresses were listed—one in Troy, Ohio, and one in Dayton, Ohio—and both listed customer email address KEYERAD2007@GMAIL.COM.

52. The 15 orders placed in the name of JAIDAH JONES or "Jadiah Jones" listed nine different billing addresses. These orders were each associated with one of four email addresses, one of which was a Google account: OPALB91773@GMAIL.COM.

O. Records from Guns.com revealed evidence of many other fraudulent purchases in WILLIAMS's name; these were linked to several Google email accounts.

53. Records from Guns.com revealed 67 attempted purchases in the name of ANEESAH WILLIAMS from April through late June 2022. The table below summarizes some key details of these transactions, including the associated Google email addresses:

Date(s)	Attempts	Email	Billing Address(es)	Transfer to
4/28/22	11	CLEARY091150@GMAIL.COM	9756 Princeton Glendale Road, Cincinnati, OH 45246	Target World
5/22/22	11	ANEESAHWILLIAMS10@GMAIL.COM	<ul style="list-style-type: none"> 1573 Rome Corners Road, Galena, OH 43021 7475 Williams Road, Athens, OH 45701 1400 Twin Spires Dr, Batavia, OH 45103 	American Trading
5/24/22	1	ANEESAHWILLIAMS10@GMAIL.COM	1642 Curry Drive Cleveland OH 44124	American Trading
5/25/22	7	ANEESAHWILLIAMS10@GMAIL.COM	<ul style="list-style-type: none"> 8788 Kellie Lane Sylvania OH 43560 1400 Twin Spires Dr Batavia OH 45103 	Target World, American Trading
6/4/22	37	ANEESAHW1994@GMAIL.COM	<ul style="list-style-type: none"> 3360 state route 39 Walnut Creek OH, 44687; 19542 Kalklosch Road Logan OH, 43138 3717 Orders Road Grove City OH, 43123 4695 East High Street Mantua OH, 44255 6399 Smiley Ave Westlake 	Hibbert Armory (Clevess, OH); West Chester Firearms (West Chester, OH)

			OH, 44145 • 815 Gatehouse Lane Columbus OH, 43235 • 1160 West Exchange Street Akron OH, 44313 • 4760 Saint Andrews Drive Westerville OH, 43082 • 451 Maplebrooke Drive East Westerville OH, 43082 • 7030 West Law Road Valley City OH, 44280 • 850 Weston Park Drive Powell OH, 43065	
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P. The phone number used for 11 attempted purchases under WILLIAMS's name was also used for suspected fraudulent orders placed in CHAD BAUER's name, with associated email address MARYVENO1937@GMAIL.COM.

54. As the table above shows, eleven attempted orders in ANEESAH WILLIAMS's name were placed with Guns.com on April 28, 2022, using the email address CLEARY091150@GMAIL.COM. The phone number associated with these orders was 330-921-0471.

55. Records from Smoky Mountain Guns show that this same phone number was listed as the buyer's phone number a few days earlier, on April 23, 2022, for two online orders of firearms under the name CHAD BAUER. The first was an order for two FN-manufactured pistols and one Glock pistol, and the second order was for a Glock pistol. The billing address on both orders was 151 Sugar Loaf Lane, Murrells Inlet, SC. The firearms were shipped to North College Hill Store, where BAUER picked them up on April 30, 2022. On the ATF Form 4473, BAUER listed his home address not as the South Carolina address on the order, but as 4614 Carter Ave. in Cincinnati, Ohio, as confirmed by his driver's license. For both of the orders under BAUER's name, the associated email address was MARYVENO1937@GMAIL.COM.

Q. IP information links the fraudulent purchases in WILLIAMS's name to fraudulent purchases in the names of several others, including NEHEMIAH and ZEPHANIAH JONES.

56. Records from Guns.com show that the orders placed in WILLIAMS's name were all placed from IP address 52.124.36.227. The records also show that many more attempted orders were placed in the names of other individuals from that same IP address. Relevant details of some of those other orders are as follows:

Name	Date(s)	Attempts	Email(s)	Billing Address(es)
MYKIA MELTON	5/25 – 5/26/22	37	RAYNELLPARKS @GMAIL.COM	<ul style="list-style-type: none"> • 6399 Smiley Ave West lake OH, 44145 • 815 Gatehouse Lane Columbus OH, 43235 • 1160 West Exchange Street Akron OH, 44313 • 4760 Saint Andrews Drive Westerville OH, 43082 • 451 Maplebrooke Drive East Westerville OH, 43082 • 4695 East High Street Mantua OH, 44255
KIANA HARRELL	5/27- 5/28/22	39	RAYNELLJONES80 @GMAIL.COM	<ul style="list-style-type: none"> • 6506 Greenoak Dr Cincinnati OH, 45248 • 3200 Warrensburg Road Delaware OH, 43015 • 6280 Kennard Road Medina OH, 44256 • 10617 Crary Lane Willoughby OH, 44094 • 1645 E Lincoln Highway Lima OH, 45807 • 2234 Wickliffe Road Columbus OH, 43221 • 6477 Niderdale Way Middletown OH, 45042
NEHEMIAH JONES	5/30- 6/3/22	22	NEHEMIAHJ470 @GMAIL.COM	<ul style="list-style-type: none"> • 6477 Niderdale Way Middletown OH, 45042 • 330-44 Windward Circle Aurora OH, 44202 • 520 Lightwind Court Westerville OH, 43081 • 138 Woodstock Drive Avon Lake OH, 44012

				<ul style="list-style-type: none"> • 5481 Franks Road Southeast Heath OH, 43056 • 1023 Beachview Road Willoughby OH, 44094 • 4971 Kinsman Court Columbus OH, 43207
NEHEMIAH JONES	4/8-4/23/22	7	SPEEDKILLER2108@GMAIL.COM	<ul style="list-style-type: none"> • 7717 Parkside Drive Parma OH, 44130 • 4652 Morse rd columbus OH, 43230 • 1844 Glenwood Dr Twinsburg OH, 44087 • 3555 Glen Allen Drive Cleveland Heights OH, 44121
Jerin Johnson Sr	6/20-6/22/22	47	OFFICIALK2163@GMAIL.COM	<ul style="list-style-type: none"> • 50 Public Square Cleveland OH, 44113 • 10453 Mc Intosh Road Pataskala OH, 43062 • 50 Public Square Cleveland OH, 44113 • 2598 Township Road 162 Cardington OH, 43315 • 93 2nd Street Clarksville OH, 45113 • 2008 Holloway Rd Holland OH, 43528
Kashawna Fisher	4/22 – 4/28/22	26	DJOMKAMALVINEE@GMAIL.COM	<ul style="list-style-type: none"> • 1317 Northfield Court Springfield OH, 45502 • 1519 Southwood Drive Lima OH, 45805 • 1317 Northfield Court Springfield OH, 45502 • 3622 Croydon Drive Northwest Canton OH, 44718 • 1317 Northfield Court Springfield OH, 45502 • 19615 Tanbark Lane Strongsville OH, 44149
ZEPHANIAH JONES ⁶	4/10-4/22/22	6	ZEPH21J@ICLOUD.COM	<ul style="list-style-type: none"> • 4600 Shepherds Way Batavia OH, 45103 • O'Bryan Place Centerville OH, 45459 • 660 Dover Center Road Bay Village

⁶ A query in OHLEG, a database available to law enforcement, showed that NEHEMIAH JONES and ZEPHANIAH JONES were issued Ohio Identification Cards with the same home address on them. This leads me to believe that the two are relatives, possibly brothers. Based on my review of ATF Form 4473s, I know that ZEPHANIAH JONES has picked up from local FFLs firearms associated with some of these orders.

				OH, 44140 • 2482 Walden Glen Circle Cincinnati OH, 45231 • 1435 Dill Road Cleveland OH, 44121
Dewayna Stevens	4/11/22	4	MARYVENO1937@GMAIL.COM	• 6726 Tara Boulevard Jonesboro GA, 30236 • 311 Ellis Street Metter GA, 30439 • 4582 Newcastle Circle Stonecrest GA, 30038

57. As the table above shows, the email address associated with the orders placed in MYKIA MELTON's name on Guns.com was RAYNELLPARKS@GMAIL.COM. Records from Smoky Mountain Guns show that the same email address is associated with attempted purchases made from that FFL in MELTON's name.

58. Records from Guns.com show that there are eight common billing addresses used by RAYNELLPARKS@GMAIL.COM and ANEESAHW1994@GMAIL.COM (i.e., one of the accounts used for the orders in ANEESAH WILLIAMS's name, described above).

59. Note that two of the attempted orders placed in NEHEMIAH JONES's name were not only placed from the same IP address as those placed in the names of HARRELL, WILLIAMS, and MELTON, but also used the same billing address as some of the orders placed under MELTON's and HARRELL's names: 6477 Niderdale Way.

R. Several other fraudulent purchases were placed in the name of NEHEMIAH JONES.

60. Records from Smoky Mountain Guns revealed additional attempted online purchases from that FFL in the last few months in the name "NEHEMIAH JONES." Some of these attempted orders, which were identified as likely fraudulent, were linked to phone number 513-801-7486, which is the same phone number linked to the attempted purchases from Guns.com using email

address NEHEMIAHJ470@GMAIL.COM. Some of the orders were linked to the same phone number but a different Gmail address: NEMOJONES811@GMAIL.COM.

S. IP information provides further evidence of links among the coconspirators.

61. Records from Guns.com show that the same two IP addresses were used to place many of the suspected fraudulent transactions associated with the suspects described above. Specifically, IP address 52.124.36.227 is linked to approximately 255 attempted firearms purchases between April 8 and June 4, 2022, associated with the following email addresses: ANEESAHW1994@GMAIL.COM, ANEESAHWILLIAMS10@GMAIL.COM, CLEARY091150@GMAIL.COM, MARYVENO1937@GMAIL.COM, DJOMKAMALVINEE@GMAIL.COM, NEHEMIAHJ470@GMAIL.COM, RAYNELLJONES80@GMAIL.COM, RAYNELLPARKS@GMAIL.COM, OFFICIALK2163@GMAIL.COM, SPEEDKILLER2108@GMAIL.COM, and ZEPH21J@ICLOUD.COM.

62. The records also show that IP Address 174.101.153.109—which is linked to JAIDAH JONES's residence⁷—was used to make approximately 103 attempted firearms purchases associated with the following email addresses: DMONIICLARK07@GMAIL.COM, DTHOMPSON20231@GMAIL.COM, HARDYYOU2009@GMAIL.COM, KENNETHHELLD98@GMAIL.COM, MICHAELM20079@GMAIL.COM, OPALB91773@GMAIL.COM, and RICHARDRIVERA20088@GMAIL.COM.

⁷ Records from Charter Communications show that from May 20 through 27, 2022, IP Address 174.101.153.109 was associated with the address 5018 Ravenna Street #2, Cincinnati, OH 45227 and subscribed in the name of "Keshia Jones." I believe this is JAIDAH JONES's address, because the address is linked to her in the OHLEG database and because JONES listed it as her address on two ATF Form 4473s she filled out when purchasing firearms on May 27, 2022.

T. Evidence suggests that NEHEMIAH JONES and ZEPHANIAH JONES use the SUBJECT VEHICLE in furtherance of the Target Offenses and that the requested tracker will lead to evidence of violations of the Target Offenses.

63. Records from Guns.com show that, from April 8, 2022, through June 22, 2022, IP address 52.124.36.227 was used to make approximately 255 attempted firearm purchases in the names of ANEESA WILLIAMS, Dewayna Stevens, JERIN JOHNSON SR., Kashawna Fisher, Kiana Harrell, MYKIA MELTON, NEHEMIAH JONES, and ZEPHANIAH JONES.

64. Records from internet service provider Whitesky Communications show that IP Address 52.124.36.227 is used to provide service to the housing complex at 424 Straight Street, Cincinnati, OH.

65. As of July 2022, the **SUBJECT VEHICLE** was registered to NEHEMIAH JONES at 424 Straight Street, Unit 626, Cincinnati, OH 45219. Additionally, both NEHEMIAH JONES and ZEPHANIAH JONES have obtained Ohio Identification Cards that list this Straight Street address as their home address.

66. On June 14, 15, 16, 2022, ATF Special Agent (SA) Brandon Stahlhut saw the **SUBJECT VEHICLE** parked in the parking garage connected to 424 Straight Street, Cincinnati, OH.

67. On June 15, 2022, SA Stahlhut saw NEHEMIAH JONES operating the **SUBJECT VEHICLE** and departing from the garage connected to 424 Straight Street.

68. On July 8, 2022, ATF SA Michelle Nelson saw the **SUBJECT VEHICLE** in the parking garage connected to 424 Straight St. being operated by two individuals that matched the description of NEHEMIAH JONES and ZEPHANIAH JONES.

69. On July 11, 2022, ATF Task Force Officer (TFO) Jason Wharton saw the **SUBJECT VEHICLE** parked in the parking garage connected to 424 Straight St.

70. On July 12, 2022, at approximately 2:02am, ATF TFO Christopher Vogelpohl saw the **SUBJECT VEHICLE** in the parking garage connected to 424 Straight St.

71. On July 12, 2022, at approximately 11:40pm, TFO Vogelpohl saw the **SUBJECT VEHICLE** in the parking garage connected to 424 Straight St.

72. On July 13, 2022, SA Stahlhut saw an individual matching the description of ZEPHANIAH JONES entering the **SUBJECT VEHICLE** and departing from the parking garage connected to 424 Straight St.

73. On July 13, 2022, Cincinnati Police Department (CPD) Police Officer (PO) Naomi Stewart queried CPD records for traffic stops or police contacts with the **SUBJECT VEHICLE**. On May 18, 2021, near the address of 2814 Werk Road, Cincinnati, OH, CPD issued a citation to NEHEMIAH JONES while he was operating the **SUBJECT VEHICLE**.

74. Based on my training and experience and the information described above, I submit that there is probable cause to believe that the requested tracking device will lead to evidence of violations of the Target Offenses, including by assisting agents in surveilling NEHEMIAH JONES and ZEPHANIAH JONES as they are engaged in violations of the Target Offenses and by helping agents identify premises used by the suspects are residences and/or stash houses. As described above, surveillance video has captured some of the coconspirators driving vehicles to local FFLs to pick up firearms ordered online. Although I have not yet seen the **SUBJECT VEHICLE** on surveillance video, I submit that there is probable cause to believe that it is being used in furtherance of the Target Offenses for several reasons. First, the evidence in this case shows that both NEHEMIAH JONES and ZEPHANIAH JONES have gone to local FFLs to pick up firearms in person. Second, based on my training and experience and familiarity with the Cincinnati area, I submit that it is unlikely that suspects with access to a vehicle would choose to take a public bus or a

taxi/ride share to the FFL, because the suspects likely would not want to bring multiple firearms on public transport or spend the extra money to take a taxi/ride share. The evidence in this affidavit shows that ZEPHANIAH JONES and NEHEMIAH JONES use the **SUBJECT VEHICLE**, which is registered to NEHEMIAH JONES. I therefore submit that being able to track the **SUBJECT VEHICLE** will assist law enforcement in surveilling ZEPHANIAH JONES and/or NEHEMIAH JONES as they travel to FFLs to pick up firearms. Additionally, even when agents are not actively conducting visual surveillance on the **SUBJECT VEHICLE**, the location information is likely to provide corroborating evidence showing when the suspects were at other locations determined to be relevant to the investigation, including at coconspirators' residences and at stash houses.

75. The requested tracker is also likely to assist law enforcement in identifying locations at which evidence of the Target Offenses will be found. Based on my training and experience, I know that evidence of firearms trafficking is often found at suspects' residences and stash houses. This evidence includes but is not limited to firearms, ammunition, firearms accessories, paperwork and records relating to firearms purchases (such as copies of receipts and ATF forms), and communications relating to the offenses (such as communications with coconspirators). Tracking the **SUBJECT VEHICLE** is therefore likely to lead to evidence of violations of the Target Offenses, as well as fruits and contraband of those violations.

76. Based on the surveillance described above, as well as information showing that NEHEMIAH JONES and ZEPHANIAH JONES live in this District, I know that the **SUBJECT VEHICLE** is presently within the Southern District of Ohio.

77. In order to track the movement of the **SUBJECT VEHICLE** effectively and to decrease the chance of detection, I seek authorization to place a tracking device on the **SUBJECT VEHICLE** while it is in the Southern District of Ohio. Because the **SUBJECT VEHICLE** is

sometimes parked in a parking garage, it may be necessary to enter onto private property to effect the installation, repair, replacement, and removal of the tracking device. Although the parking garage connected to 424 Straight Street appears to be open to the public, out of an abundance of caution I am requesting that the Court expressly authorize law enforcement to enter this parking garage, where the **SUBJECT VEHICLE** has repeatedly been seen, for the purpose of installing the tracking device.

78. To ensure the safety of the executing officer(s) and to avoid premature disclosure of the investigation, it is requested that the court authorize installation, maintenance, and removal of the tracking device during both daytime and nighttime hours. As described above, the suspects under investigation are illegally obtaining firearms and may be armed. If agents install the tracker during daytime hours, they are more likely to be seen and could be put at risk of retaliation from the suspects.

79. If the Court grants this application, there will be periodic monitoring of the tracking device during both daytime and nighttime hours for a period not to exceed 45 days following issuance of the warrant. The tracking device may produce signals from inside private garages or other such locations not open to the public or visual surveillance.

AUTHORIZATION REQUEST

80. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 3117, that authorizes members of ATF or their authorized representatives, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to install a tracking device on the **SUBJECT VEHICLE** within the Southern District of Ohio within 10 days of the issuance of the proposed warrant, to maintain, repair, and/or replace the tracking device as necessary, and to remove

the tracking device from the **SUBJECT VEHICLE** after the use of the tracking device has ended; to install, maintain, and remove the tracking device during both daytime and nighttime hours; to surreptitiously enter the parking garage connected to 424 Straight Street in Cincinnati, Ohio; and to monitor the tracking device for a period of 45 days following the issuance of the warrant, including when the tracking device is inside private garages and other locations not open to the public or visual surveillance, both within and outside the Southern District of Ohio.

81. In accordance with 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), I further request that the warrant delay notification of the execution of the warrant for 30 days after the end of the authorized period of tracking (including any extensions thereof) because there is reasonable cause to believe that providing immediate notification may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice would seriously jeopardize the ongoing investigation by prematurely revealing its existence and giving suspects an opportunity to flee from prosecution, destroy or tamper with evidence, intimidate potential witnesses, notify confederates, and change patterns of behavior.

82. I further request that the Court seal the warrant and the affidavit and application in support thereof, except that copies of the warrant in full or redacted form may be maintained by the United States Attorney's Office and may be served on Special Agents and other investigative and law enforcement officers of the ATF, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers, as necessary to effectuate the warrant. These documents pertain to and discuss an ongoing criminal investigation that is neither public nor known to all the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature

disclosure may seriously jeopardize the investigation. Sealing these documents will also better ensure the safety of agents and others.

Respectfully submitted,

Derek Graham
DEREK GRAHAM
Special Agent
Bureau of Alcohol, Tobacco, Firearms, and
Explosives

Subscribed and sworn to before me via FaceTime videoconference on July 14, 2022.
via electronic means, specifically Facetime video.

Stephanie K. Bowman
HON. STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE

